

Comment #	Original Comment	Original UDWR Response	BLM Comment Disposition	UDWR Response
BLM 638	Sub-section title is "Utah", but many of the surface water features listed in the bullet list are in Arizona. Why are they then listed and discussed in the Utah section? Please correct this.	The text has been revised to address the comment	Thank you for making this edit – but please note that there is now an extra (unnecessary) comma in the 2nd bullet on page 5-166 of the revised text.	Edit made. The second paragraph of Section 5.3.4.1.1, Chapter 5, Exhibit E of the License Application is revised to read: The portions of the Proposed Action in Utah would involve the following surface water features: <ul style="list-style-type: none"> • Proposed Action Intake and Water Conveyance Systems: Paria River • Proposed Action Hydro System: Kanab Creek and Sand Hollow Reservoir • Transmission Line Alignments: Paria River
BLM 649	1st paragraph: Much of this information is already stated in Section 5.1.4, so no need to repeat it here (at most, reference that section here). 2nd line of 2nd paragraph: USGS acronym has already been defined, so don't redefine it here.	The suggested edit from the second paragraph from the above comment has been incorporated.	1st comment: Comment was not addressed ... please make same edit as was done for BLM Comment 648. 2nd comment: Okay	Information in Section 5.1.4 referenced. The first paragraph in Section 5.3.4.1.6, Chapter 5, Exhibit E of the License Application is revised to read: As described in Section 5.1.4, Sand Hollow Reservoir is located about 5 miles southwest of Hurricane, Utah. The reservoir is used as M&I raw water supply for WCWCD customers. The reservoir has an active pool of about 30,000 acre-feet and a drought pool of 20,000 acre-feet that would provide water supplies in an extreme drought. There are no beneficial use designations in the UAC for Sand Hollow Reservoir.
BLM 650	2nd and 3rd lines after bullet list: UAC and AAC acronyms have already been defined, so don't redefine them here.	The suggested edit has been incorporated.	Part of comment related to "UAC" acronym was not incorporated.	Acronym definitions deleted. The first sentence in the second paragraph of Section 5.3.4.2.1, Chapter 5, Exhibit E of the License Application is revised to read: Criteria for evaluating water quality in the surface water bodies in the vicinity of the proposed pipelines are based on beneficial uses and water quality objectives as determined by the UAC R317-2 and the AAC R18-11-105.
BLM 652	Clearing and Grading <ul style="list-style-type: none"> • 7th line: Also need to discuss that increased sediment recruitment would result in increased salinity into the Colorado River (reference the Colorado River Basin Salinity Control Program). Open-Cut Crossings <ul style="list-style-type: none"> • 2nd paragraph: Also need to discuss that increased sedimentation would result in increased salinity into the Colorado River (reference the Colorado River Basin Salinity Control Program). Trenchless Construction Techniques <ul style="list-style-type: none"> • 3rd line: UAC acronym has already been defined, so don't redefine it here. 	All mitigation measures will be identified and implemented. BMPs employed during construction and operation will prevent sediment recruitment and resultant increases in salinity in the Colorado River Basin. The Colorado River Basin Salinity Control Program emphasizes agricultural flows and reduces soil erosion due to agricultural activity; the program goals will be satisfied by BMPs to control sediment and salinity releases. Because open-cut pipeline crossings will be constructed during dry conditions or with use of active temporary water diversion, sediment recruitment will not be significant. Any negligible effects to overall Colorado River salinity would not be measureable. The suggested edit from the third bullet from the above comment has been incorporated.	Issue of increased salinity – while the Colorado River Basin Salinity Control Program may "emphasize" agricultural flows and reduce erosion due to agricultural activity, it doesn't exclusively focus on agricultural activities. We on the AZ Strip regularly receive special salinity program funding to control sediment recruitment from "regular" (i.e., non-agricultural) flow through drainages on public lands, and we provide information annually to Congressional reports on this issue. Thus, we need to mention potential sediment recruitment and salinity in this section, even if those salinity contributions are not "significant". Then the Environmental Effects section would reflect that conclusion ... but it should not just be ignored/omitted from Exhibit E. Please add this to the analysis. Comment related to "UAC" acronym was not incorporated.	Information is added addressing the issue of increased salinity. Please see the attached Extended Narrative document for the response to BLM Comment No. 652.
BLM 655	Intake and Discharge Construction <ul style="list-style-type: none"> • 9th line on page: What is meant by "disposal by land application"? And where would this disposal occur? Need to delineate/identify that here. • 10th line on page: So there could be "controlled" turbidity? 	Refer to the response to BLM Comment 654. The text has been revised to state "... and there will be no turbidity or other water quality effects in the Sand Hollow Reservoir".	1st bullet: UDWR response is okay for construction material at Lake Powell, but what about disposal of "construction site drainage" at Sand Hollow that would be "disposed away from the reservoir"? Disposed of where? This was not addressed in the comment response. 2nd comment: Okay	The Final License Application (FLA) filed May 2, 2016 with FERC has the text referenced in BLM Comment No. 655 in Section 5.3.4.2.2.1. The first sentence of the second paragraph of the "Intake and Discharge Construction" portion of Section 5.3.4.2.2.1, Chapter 5, Exhibit E of the License Application is revised to read: Construction of Sand Hollow Hydro Station would be performed in upland conditions where all construction site drainage would be collected, pumped into settling ponds and disposed away from the reservoir via land application on private, county or state owned lands, or via infiltration in accordance with protocols established as part of the general construction stormwater permit.

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BLM 656	1st paragraph: Also need to discuss the increased salinity (from transport of saline soils) into the Colorado River (reference the Colorado River Basin Salinity Control Program).	Refer to the response to BLM Comment 652.	See Comment No. 652 response by BLM.	Information on salinity control is added. The second sentence of the first paragraph of Section 5.3.4.2.2.2, Chapter 5, Exhibit E of the License Application is revised as follows: The use of BMPs and standard construction procedures (SCPs) at pipeline crossings of streams would avoid or minimize temporary water quality effects, primarily consisting of turbidity, sediment recruitment, and increased salinity. A new sentence is inserted immediately thereafter which reads: The BMPs implemented would satisfy the goals of the Colorado River Basin Salinity Control Program.
BLM 657	<ul style="list-style-type: none"> • 4th bullet in list: Add that all refueling should be done at least ¼ mile from any stream. • 5th bullet in list: Describe where this “land applied disposal” would occur. • 6th bullet in list: Need to identify what would be done with the sediment that would be captured by this silt 	Temporary land application system using surface sprinklers would be used for land disposal. If dewatering is required during excavation, water would be pumped into a portable reservoir prior to discharge. If sufficient volume accumulates, water would be pumped into a temporary sprinkler system and sprinklers would discharge the water to land application/evaporation.	<p>1st bullet: not addressed.</p> <p>2nd bullet: BLM needs to know if any of this “disposal” would occur on public land, and if so, where (so we can work with UDWR to make sure it’s not in a manner that would concern us.</p> <p>3rd bullet: Comment not addressed.</p>	Please see the attached Extended Narrative document for the response to BLM Comment No. 657.
BLM 658	<p>2nd line references operation and maintenance of powerlines, but more impacts could occur from construction of these transmission lines – please add that to the analysis.</p> <p>6th/7th lines: Need to identify the location(s) of these water discharges in order to have an accurate impacts analysis.</p>	Refer to the responses to BLM Comments 467 and 468.	<p>Even if minimal effects from construction of power lines, this needs to be added to the analysis (recommend adding this to Section 5.3.4.2.2.2).</p> <p>2nd comment not addressed in UDWR response.</p>	<p>Additional analysis is included about the minimal to no-effects of the construction of powerlines on water quality. The following sentences are added as a new last paragraph to Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application: All construction of transmission lines would occur well away from streams or washes and BMPs would be used to contain any runoff should a rain event occur during construction. BMPs such as filter berms, silt fence or straw wattles would be implemented to eliminate any effects of the runoff on water quality.</p> <p>A general description of the location of discharges is provided. The third sentence of the first paragraph of Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application is revised to read: However, operation and maintenance of the proposed pipelines would include occasional water discharges at low points in the pipeline and/or penstock profile that would be determined during the design phase of the LPP that would have the potential to affect natural surface water features in the LPP area.</p>
BLM 659	<p>Drain Valves</p> <ul style="list-style-type: none"> • 5th and 9th lines: Need to identify the location(s) of where this discharge and penstock drainage would occur (in order to have an accurate impacts analysis). • 2nd paragraph: What measures would be included to avoid this erosion? At least need to summarize those measures here (in order to have an accurate impacts analysis). 	BMPs are presented in Chapter 3 of the text.	Comments not addressed ... need to summarize what’s in the BMPs here since they are part of the alternatives and therefore a critical part of the analysis.	<p>General penstock discharge drainage locations are added and BMPs are summarized. The third and sixth sentences of the "Drain Valves" portion of Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application is revised as follows: The Water Conveyance System would be drained back to the booster pump stations, and low points in the pipeline would be drained to dry washes at locations which would be determined in the design phase of the project.</p> <p>Low points in the Hydro System penstocks would be determined during the design phase of the project and would be drained to adjacent drainage channels at low discharge rates.</p> <p>The following sentence is added to the end of the second paragraph of the "Drain Valves" portion of Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application: BMPs such as filter berms, silt fence or straw wattles would be implemented to reduce the release velocity and to control erosion.</p>

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BLM 660	<p>Sand Hollow Reservoir Water Quality Effects</p> <ul style="list-style-type: none"> • 4th line: TDS acronym has already been defined, so don't redefine it here. • 8th, 9th, 10th lines: Insert "would" before "occur" (line 8) and "include" (lines 9, 10). <p>Inflows</p> <ul style="list-style-type: none"> • 1st bullet, 3rd/4th lines: Delete the duplicative "acre-feet per year". • 5th line: Replace "after" with "from." • 2nd bullet, 1st/2nd lines: Much of the precipitation is also absorbed into the very sandy soils in the area (which have a high water holding capacity). • 2nd/3rd lines: Vegetation does not "consume" precipitation per se, so please rewrite this part of the sentence to read "... evaporates or soaks into the soil because of the minimal precipitation in the area and the sandy nature of the soils in the area that have a high water absorption capacity." 	<p>The suggested edits have been incorporated.</p>	<p>Edit is fine Edit is fine 3rd comment was not addressed – text uses "AF," "acre-feet", and "ac-ft" ... need to be consistent on which format is used. 5th bullet: Also due to the nature of the soils ... please add this. Last comment/edit was not incorporated (the part about veg. "consuming" precip was deleted, but the rest was not incorporated. Also need to add that much of the precip that falls is lost due to the nature of the soils (very sandy or gravelly in many areas).</p>	<p>Edits made. The eighth sentence in the eleventh paragraph in Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application is revised to read: It is assumed that the initial (year 2025) storage volume in the reservoir is 50,000 ac-ft and the corresponding TDS concentration in the reservoir is 600 milligrams per liter (mg/L).</p> <p>The 12th paragraph in Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application is revised to read: • Phased delivery of raw water from Lake Powell via the LPP – Table 5-67 lists the planned phased deliveries of raw water from Lake Powell to Sand Hollow Reservoir. Annual deliveries increase from approximately 4,153 ac-ft per year in 2024 to approximately 69,000 ac-ft per year in 2046. Annual deliveries remain constant at 69,000 ac-ft per year from 2046 through 2060. The TDS concentration in the Lake Powell raw water is assumed to be 540 mg/L.</p> <p>The first sentence in the 13th paragraph in Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application is revised to read: • Precipitation to Sand Hollow Reservoir – It is assumed that most of the precipitation in the area either evaporates or infiltrates into the soil because of the minimal precipitation in the area and the very sandy or gravelly nature of the soils that have a high water absorption capacity.</p>
BLM 662	<p>Lake Powell and Lower Colorado River Effects</p> <ul style="list-style-type: none"> • 2nd/3rd lines: TDS acronym has already been defined, so don't redefine it here. • 3rd/4th lines: CRSS acronym has already been defined, so don't redefine it here. <p>Lake Powell</p> <ul style="list-style-type: none"> • 4th line: Be consistent with Line 7, and replace "86K" with "86,249 ac-ft". <p>Glen Canyon Dam Releases</p> <ul style="list-style-type: none"> • 2nd line of 2nd paragraph: Statement about estimating release temperatures for 2050-2056 on full pool elevations is not based on a very valid assumption given that lake levels over the past many years have been nowhere near full pool elevation. Please make the assumptions more realistic, and use something less than full pool elevation. (See lines 5-6 on page 5-221, where low pool levels are discussed ... this is much more valid an assumption on which to base this analysis.) 	<p>The report previously assumed that the lake levels are at full pool elevations, however, this assumption has changed at the present time. Refer to the Bureau of Reclamation Analysis of Water Quality (Exhibit E) for the most updated Water Quality results. The updated Water Quality results were not available when the PLP was prepared. The suggested edits from the first, second, and third bullets of the above comment have been incorporated.</p>	<p>Edit is fine Edit is fine Edit is fine Need to incorporate the "revised" BOR assumption because basing the analysis on full pool elevations is not based on a very valid assumption given that lake levels over the past many years have been nowhere near full pool elevation.</p>	<p>The previous analysis of Glen Canyon Dam release temperatures is revised in the following paragraph to more clearly state the water quality modeling assumptions and results. Reclamation modeling of Glen Canyon Dam releases to simulate temperature, dissolved oxygen and TDS concentration changes was performed using the CE-QUAL-W2 model, which relies on historic reservoir elevation and water quality data. This model is calibrated for each water quality parameter to compare simulated water quality conditions with historic data from 1990 through 2008. The absolute mean error of reservoir release temperatures is 0.45°C between simulated and actual measurements, with 5 percent statistical error. The complete water quality modeling report prepared by Reclamation is presented as Appendix A in the Final Surface Water Quality Study Report filed as part of the License Application.</p> <p>The second paragraph under the heading Glen Canyon Dam Releases in Section 5.3.4.2.2.3, Chapter 5, Exhibit E of the License Application is revised to read: On average, modeled results for the Proposed Action compared with the No Action alternative are within 0.1°C for the 2045-2060 period, which are less than the measurement accuracy of current instrument technology. For individual years, differences of up to 0.71°C are predicted (Reclamation 2016). These modeled differences from the Proposed Action may be lower or higher than the No Action scenario. Glen Canyon Dam release temperatures often peak in October and simulated results show water temperatures of releases from the dam under the Proposed Action scenario are slightly warmer than under the No Action alternative scenario. The release temperatures from the dam in the Proposed Action scenarios are slightly colder when the reservoir is fuller during the winter and spring months because warm water from the upper, warm layer of the reservoir would be diverted under the Proposed Action. Simulated release temperatures for the Proposed Action scenario are slightly warmer than the No Action alternative scenario during summer and fall months when reservoir pool elevations are lower in the annual storage and release cycle. The largest differences between the Proposed Action scenario and the No Action alternative scenario coincide with the lowest reservoir pool elevations (Reclamation 2016).</p>

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BLM 664	<p>1st line after bullet list: So there could be “controlled” discharge? And where would this discharge occur? Need to delineate/identify that here (or somewhere in this PLP).</p> <p>6th/7th lines after bullet list: Where would this discharge to surface waters occur? Need to delineate/identify that here (or somewhere in this PLP).</p> <p>Last line on page: Insert “as Lake Powell water replaces Virgin River water in the reservoir” to the end of the sentence.</p>	<p>Refer to the response to BLM Comment 187.</p> <p>The suggested edit from the third paragraph from the above comment has been incorporated.</p>	<p>Not knowing this NOW makes for a rather flawed analysis of impacts.</p> <p>Not knowing this NOW makes for a rather flawed analysis of impacts.</p> <p>Edit is fine</p>	<p>The text referenced in BLM Comment No. 664 is located in Section 5.3.4.2.2.4, Chapter 5, Exhibit E of the License Application. There would be controlled discharge and the measures to accomplish that, as well as a general description of the location of discharge points are added to the section. The following sentences are inserted starting as the second sentence, Section 5.3.4.2.2.4, Chapter 5, Exhibit E of the License Application: The Water Conveyance System would be drained back to the booster pump stations, and low points in the pipeline would be drained to dry washes at locations which would be determined in the design phase of the project. Low points in the Hydro System penstocks would be determined during the design phase of the project and would be drained to adjacent drainage channels at low discharge rates. The following sentence is inserted as the second to last sentence in the third paragraph of section 5.3.4.2.2.4, Chapter 5, Exhibit E of the License Application: BMPs such as filter berms, silt fence or straw wattles would be implemented to reduce the release velocity and to control erosion.</p> <p>The general location of discharge to surface waters is added. The last sentence of the fifth to last paragraph of Section 5.3.4.2.2.4, Chapter 5, Exhibit E of the License Application is revised as follows: Discharges to surface waters such as the Colorado River below Lake Powell, the Paria River, or Sand Hollow Reservoir during project operation would typically be from a settling tank to a natural drainage, and may be subject to UPDES or APDES permit requirements.</p>
BLM 668	<p>3rd/4th lines on page: The analysis of impacts should include an analysis with mitigations built in. Then impacts would be substantially less than stated here. (Or are none proposed?) Please explain how a facility would be proposed without mitigations to prevent violating surface water quality standards. Sounds like this is just trying to over-estimate impacts of this alternative.</p> <p>5th/6th lines on page: Delete “and the organisms inhabiting the river” – remember that this is not the aquatic resources section).</p>	<p>The text has been revised to include additional mitigation for construction. Other effects, such as generation of RO brines, would result in approximately 2,000 acres of land that would be permanently repurposed for evaporation ponds; reduction in recharge to groundwater would reduce recharge to the Virgin River; no mitigation measures have been identified that could be applied to these effects.</p> <p>The suggested edit from the second paragraph from the above comment has been incorporated.</p>	<p>The analysis of impacts here is based upon a completely inaccurate suite of assumptions. The final groundwater study report was updated with the language but this information was not included in the License Application.</p> <p>The study report uses these numbers to defend the conclusions regarding impacts to groundwater recharge due to the lack of residential landscape watering in the No Lake Powell Water Alternative. However, there is no citation or further explanation as to where these numbers come from. There is a list of about 23 references at the end of the report, but the reader should not be forced to figure out which reference these data came from by reading through each one when a simple citation can be inserted.</p> <p>Furthermore, there is no discussion as to why there seems to be a discrepancy between the two references cited in the original comment (BLM #794) and whatever reference was used for the numbers in the UDWR response.</p> <p>This issue of significant decreases in groundwater recharge from the lack of landscape watering is mentioned in several other resource sections and seems to be the key argument for why there would be significant detrimental effects from the No Lake Powell Water Alternative. As such, a very strong argument needs to be made to back this assertion up, along with solid, verifiable data.</p>	<p>The effects of the No Lake Powell Water Alternative were discussed during the meeting between BLM and UDWR on March 17, 2017. Based on these discussions we understand that BLM’s primary concern is that USGS documents cited in the analysis of changes to urban groundwater recharge appear to contradict the conclusions of the groundwater impact analysis in the environmental report. The impact analysis for the alternative is based on localized recharge of the shallow subsurface soils in the vicinity of the urban irrigation and describes the potential effects of changes to this groundwater resource from the alternative. UDWR agrees with BLM that these site-specific changes in groundwater conditions are not in total agreement with conditions described in the two USGS reports. We recognize these differences do exist and suggest the cited USGS documents describe groundwater conditions at a different scale than is described in the impact analysis for the alternative as the reason for the differences. In addition to the response below, please refer to the attached Extended Narrative document for the response to this comment and BLM comment No. 694.</p> <p>The following sentence is added as the first sentence of Section 5.3.4.2.5, Chapter 5, Exhibit E of the License Application: The effects of the No Lake Powell Water Alternative presented below are localized, anthropomorphic changes imposed in addition to other natural and man-made conditions described in other reports.</p>

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BLM 670	3rd line on page: This SWPPP would also need to be developed in collaboration with the federal land management agencies.	The text has been revised to indicate that the SWPPP would be developed in collaboration with federal land management agencies.	UDWRe's stated edit was not incorporated (but should be). Please add "and subject to final approval by the federal land management agencies" after "in collaboration with the contractor(s)" on the 3rd to last line in this revised section.	Approval role of federal land management agencies is added. The second sentence in the third paragraph of Section 5.3.4.3.1, Chapter 5, Exhibit E of the License Application is revised to read: The final SWPPP would be developed in collaboration with the contractor(s) and federal land management agencies and subject to final approval by the federal land management agencies. The SWPPPs would be site specific for each phase of the construction, and applied to all LPP facilities (pipelines, penstocks, booster stations, power transmission lines, hydro generating stations, etc.).
BLM 671	<p>Preservation of Existing Vegetation</p> <ul style="list-style-type: none"> • 3rd line: This plan would also need to be developed in collaboration with, and ultimately approved by, the federal land management agencies. <p>Soil Binders</p> <ul style="list-style-type: none"> • 1st line: Use of soil binders would also need to be done in collaboration with, and ultimately approved by, the federal land management agencies. 	Your comment has been noted.	"Comment has been noted" is not an adequate response. The text needs to be revised as UDWRe asserts was done for BLM Comment No. 670.	<p>Approval role of the federal land management agencies has been added. The second sentence of the second paragraph of Section 5.3.4.3.1.1, Chapter 5, Exhibit E of the License Application is revised to read: Prior to clearing and grubbing activities, a plan to preserve existing vegetation to minimize erosion would be developed in collaboration with, and ultimately approved by, the federal land management agencies.</p> <p>The first sentence of the third paragraph in Section 5.3.4.3.1.1 Chapter 5, Exhibit E of the License Application is revised to read: Soil binders would be used, following collaboration with and ultimately with the approval of the federal land management agencies, on disturbed areas that require temporary stabilization of the soil surface to prevent erosion caused by rainfall or wind.</p>
BLM 673	<p>Sediment Basins</p> <ul style="list-style-type: none"> • 1st line: This plan would need to be developed in collaboration with, and ultimately approved by, the federal land management agencies. • 9th/10th lines: Where would these accumulated sediments be removed to? 	The text has been revised to state that the design and planning for these structures would be developed in collaboration with, and ultimately approved by, the federal land management agencies. All sediment would be disposed of separately in off-channel areas within the pipeline Right-of-Way. The sediment would be spread out into land away from the stream channel that doesn't drain directly into the stream channel. Section 5.3.4.2.2.2.3 text will be changed to clarify that any disposal of sediment would be outside of the stream channel boundaries.	<p>Edit is fine</p> <p>Note that the location of this disposal will need BLM approval.</p>	<p>Wording regarding BLM approval is added. The last sentence of the "Sediment Basins" portion of Section 5.3.4.3.1.2 - Sediment Control, Chapter 5, Exhibit E of the License Application is revised to read: Sediments would be land applied within the right-of-way in uplands away from the receiving water or direct drainage area at locations approved by the landowners or federal land management agencies, as appropriate.</p>
BLM 675	There is NO explanation of why/how these conclusions were reached. Please add that.	The text has been revised to include a discussion of how effects were determined. Refer also to the response to FERC Comment 33.	<p>Comment was not addressed ... there is no additional text on short-term cumulative effects.</p> <p>And what about potential cumulative effects on surface water in the Paria River – that's not mentioned here.</p>	<p>Text added on short term cumulative effects and the Paria River. The first paragraph in Section 5.3.4.4.1, Chapter 5, Exhibit E of the License Application is revised to read: The Proposed Action would have minimal short-term effects on surface water quality during construction across streams including the Paria River and ephemeral drainages. Implementation of BMPs and SCPs as discussed in Section 5.3.4.2.2.1 would minimize short-term effects on surface water quality, and there would be no measurable effects on surface water quality in the Paria River and ephemeral drainages during construction of pipeline and penstock crossings. Therefore, there would be no measurable cumulative effects of the LPP alternatives on surface water quality when combined with other past, present, and reasonably foreseeable future actions. The unmeasurable short-term cumulative effects would not be significant.</p>
BLM 678	NEW SUB-SECTION: There needs to be a sub-section on analysis of impacts from the No Action Alternative (which is currently missing) - please add.	A new subsection with header "NO ACTION ALTERNATIVE" has been added (See Section 5.4.4.4.5). There will be no impact under the No Action Alternative.	<p>Thank you for adding the new sub-section, but it needs to explain why no cumulative effects (it should be obvious to the reader, but we still need to describe it). And why would the cumulative effects under this alternative not be the same as with the No Lake Powell Water alternative? Seems like it should be.</p>	<p>An explanation is added regarding no cumulative effects. Section 5.3.4.4.5, Chapter 5, Exhibit E of the License Application is revised to read: The No Action Alternative would have no cumulative effects on surface water quality in Lake Powell and the Colorado River downstream from Glen Canyon Dam, in streams and ephemeral drainages crossed by the LPP action alternatives, and in Sand Hollow Reservoir. No federal action authorizing diversion of water from the Colorado River would occur with this alternative and thus existing conditions would continue to evolve subject to natural or other anthropogenic influences and factors.</p> <p>Please see the response to BLM Comment No. 667 for an explanation of the difference between the No Action and No Lake Powell Water alternatives.</p>

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BLM 680	NEW SUB-SECTION: There needs to be a sub-section on analysis of impacts from the No Action Alternative (which is currently missing) – please add.	The text has been revised to address the comment.	Thank you for adding the new sub-section, but it needs to explain why no effects (it should be obvious to the reader, but we still need to describe it). And why would the cumulative effects under this alternative not be the same as with the No Lake Powell Water alternative? Seems like it should be.	An explanation of why there would be no cumulative effects is added. Section 5.3.4.5.5, Chapter 5, Exhibit E of the License Application is revised to read: The No Action Alternative would have no short-term or long-term unavoidable adverse effects on surface water quality in Lake Powell and the Colorado River downstream from Glen Canyon Dam, in streams and ephemeral drainages crossed by the LPP action alternatives, and in Sand Hollow Reservoir. No federal action would occur with this alternative and thus existing conditions would continue to evolve subject to natural or other anthropogenic influences and factors.